

Law Office of Jeffrey Jones

Jeffrey Jones*

6540 Stage Road
Bartlett, TN 38134
Tel. (901)386-1207
Fax (901) 386-1294
Website: LawJJ.com

**Certified Civil Trial Specialist By the Tennessee Commission on Continuing Legal Education and
Specialization and by the National Board of Trial Advocacy.*

January 3, 2012

Ms. Debra Lynn Ireland
Assistant U.S. Attorney
Clifford Davis Federal Office Building
167 North Main, Suite 800
Memphis, TN 38103

Re: USA v. David Ray Daniels No. 2:11-cr-20320-STA

Dear Ms. Ireland,

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the defendant hereby requests copies of all items discoverable under subparagraphs (a) (1) (A), (B), (C), (D) and (E).

2. The defendant further requests notice of the government's intention to use any like and similar conduct on the part of the defendant, or other crimes or evidence, should this case proceed to trial, pursuant to Rule 404(b).

3. The defendant further requests notice of any items seized by agents of the United States from the person or residence of the defendant which may be or could be the subject of a motion to suppress evidence per Rule 12(d) (2).

4. The defendant further requests notice of the use of any electronic surveillance or wiretap in this case.

5. This discovery request includes the production of information contained in the files or otherwise known to any municipal or state agency, civil, administrative or criminal in nature, which information has formed part of the decision to prosecute.

6. This letter also requests the disclosure by the government of "Brady"-type material.

7. The Defendant further requests the existence, substance, extent, and the manner of execution or fulfillment of any inducement, promise, statement, agreement, understanding, or arrangement, either verbal, written, or implied, between the government and any of its agents and any prosecution witness, or his or her attorneys or representatives, for the purpose of obtaining said person's testimony, cooperation, or provision of information to the government wherein the government has agreed, as to any of the following;

(a) Not to prosecute said person for any crime or crimes, charged or uncharged.

(b) To provide a formal grant of statutory immunity, or to provide an informal assurance that the person will not be prosecuted in connection with any testimony, cooperation, or information given.

(c) To recommend leniency or a particular sentence for any crime or crimes for which he or she stands convicted or for which he or she will be charged or is expected to be convicted.

(d) To reconsider or otherwise alter its present position towards sentence, prosecution, or other exposure based upon the nature and extent of the person's future testimony or cooperation relative to this or any other case.

(e) To make any recommendation of benefit to the person or any state or federal agency.

(f) To provide favorable treatment or consideration, such as money, a job, a new location, etc., to the person himself or to friends or relatives of the person in return for his testimony, cooperation, or provision of information.

(g) Not to prosecute a third party for any crime or crimes where the reason for not prosecuting said third party is the consideration to the person or witness.

(h) To make any other recommendations of benefit, or to give any other consideration to the person or friends or relatives of said person.

Sincerely,

/s/ Jeffrey Jones

JJ/km

cc: Debra Lynn Ireland
deb.ireland@usdoj.gov